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Hearing Date: May 3, 2017  
Hearing Time: 10:00 AM (EST)  
Objection Deadline: April 3, 2017

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO TRUSTEE'S  
SUPPLEMENTAL MOTION AND MEMORANDUM OF LAW TO AFFIRM HIS  
DETERMINATIONS DENYING CLAIMS OF CLAIMANTS HOLDING INTERESTS  
IN RICHARD B. FELDER AND DEBORAH FELDER TENANCY IN COMMON**

Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC (the "Trustee") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.* and the chapter 7 estate of Bernard

L. Madoff, by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On March 15, 2017, the Trustee filed the Trustee's Supplemental Motion and Memorandum of Law to Affirm His Determinations Denying Claims of Claimants Holding Interests in Richard B. Felder and Deborah Felder Tenancy In Common (the "Motion") (ECF No. 15234) and filed the Declaration of Vineet Sehgal in support of the Trustee's Motion and Memorandum to Affirm His Determinations Denying Claims of Claimants Holding Interests in Judy L. Kaufman *et al.* Tenancy In Common, Richard B. Felder and Deborah Felder Tenancy In Common, and Keith Schaffer, Jeffrey Schaffer, Carla R. Hirschhorn Tenancy In Common<sup>1</sup> (the "Sehgal Declaration"), on January 13, 2017 (ECF No. 14845).

2. The deadline for filing objections to the Motion expired on April 3, 2017 at 4:00 p.m.

3. Notice of the Motion was provided by U.S. Mail, postage prepaid or email to (i) all claimants listed on Exhibit 2 annexed to the Sehgal Declaration; (ii) all parties included in the Master Service List as defined in the Order Establishing Notice Procedures (ECF No. 4560); (iii) all parties that have filed a notice of appearance in this case; (iv) the SEC; (v) the IRS; (vi) the United States Attorney for the Southern District of New York; and (vii) SIPC, pursuant to the Order Establishing Notice Procedures (ECF No. 4560).

4. Counsel for the Trustee has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon.

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<sup>1</sup> The portion of the Motion as to the remaining Objecting Claimants was granted by this Court's Order Approving Trustee's Motion and Memorandum of Law to Affirm His Determinations Denying Claims of Claimants Holding Interests in Judy L. Kaufman Tenancy In Common and Keith Schaffer, Jeffrey Schaffer, Carla R. Hirschhorn Tenancy In Common entered April 13, 2017. ECF No. 15825.

5. Mr. Jeffrey Felder informed the Trustee's counsel that there would be no objection filed to the Motion.

6. An electronic copy of a proposed order (the "Order"), that is substantially in the form of the proposed order that was annexed to the Motion, and Exhibit A thereto will be submitted to the Court, along with this certificate.

7. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing, but notes that the Felder Objecting Claimants are *pro se*.

Dated: New York, New York  
April 25, 2017

By: /s/ David J. Sheehan  
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